



Hoosier Chapter

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IDEM - Office of Water Quality
attn: Selena Medrano, TMDL Program
100 North Senate Avenue, MC 65-42 IGCN N1255
Indianapolis, IN 46204

Re: Busseron Creek Draft TMDL

Dear Ms. Medrano:

The Busseron Creek Watershed TMDL Development revised public review draft of September 3, 2008, is a worthwhile effort to assess the current condition of the streams in the watershed. I applaud the Indiana Department of Environmental Management (IDEM) for allowing the TMDL developer, Tetra Tech, to use the most current information on water quality and biological impairments rather than focusing solely on the impairments listed in the 2006 Section 303(d) list. It would not have been a wise use of IDEM's limited resources if the contractor had ignored newly available data.

I also agree with the use of an explicit, percentage-based margin of safety along with the implicit conservative assumptions used in calculating pollutant loading capacities. A ten percent margin of safety should provide an additional cushion of protection to ensure that the impaired aquatic habitat will be restored and protected.

However, the implementation section of the draft TMDL is inadequate. The brief summary of Department of Natural Resources projects to remediate abandoned mine lands doesn't address the questions of how much it will cost to restore the biological community harmed by mine runoff and who should be responsible for these costs. Similarly, the simple recital of agricultural best management practices and public information requirements for proper septic system maintenance doesn't help provide any meaningful direction for reducing nutrient impacts in the watershed.

A TMDL implementation section should contain the following elements: (1) recommended actions to reduce pollutant loadings; (2) the estimated cost of such actions; (3) identification of the organizations that will be responsible for the implementation of those actions; and (4) a timeline for completion of the actions. These elements should be added to the TMDL before IDEM considers it to be final.

Thank you for your consideration of these comments.

Sincerely,

Bowden Quinn
Conservation Program Coordinator
Sierra Club Hoosier Chapter